

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

KAREN LOWY, individually and as parent
and next friend of N.T.,

Plaintiffs,

v.

DANIEL DEFENSE, LLC, et al.,

Defendants.

Case No. 23-CV-01338-CMH-IDD

**DEFENDANTS' JOINT MOTION FOR A STAY OF DISCOVERY
PENDING RESOLUTION OF THEIR MOTIONS TO DISMISS**

Defendants,¹ pursuant to Federal Rule of Civil Procedure 26(c), hereby move the Court to stay discovery pending resolution of Defendants' Motions to Dismiss. (Dkt. Nos. 61, 65, 72, 74, 79, 81, 83).² The reasons and authority for this Joint Motion are set forth with particularity in the accompanying Memorandum in Support.

WHEREFORE, for the reasons set forth in the accompanying Memorandum in Support, Defendants respectfully request that the Court grant their Joint Motion for a Stay of Discovery Pending Resolution of Their Motions to Dismiss, pursuant to Federal Rule of Civil Procedure 26(c), and for this Court to enter such other and further relief as this Court deems just and proper.

¹ All Defendants who have been served as of today's date (November 15, 2023) and had a response deadline of November 13, 2023 join this motion. Specifically, Bravo Company USA, Inc., Loyal 9 Manufacturing, LLC, FosTech, Inc., Hearing Protection, LLC, Centurion Arms, LLC, Magpul Industries Corp., Federal Cartridge Company, Vista Outdoor, Inc. Fiocchi of America, Inc., SureFire, LLC, and TorkMag, Inc. join this motion. Separately, Plaintiffs voluntarily dismissed their claims against Starline, Inc. on November 9, 2023. (Dkt. Nos. 60, 96).

² Daniel Defense, LLC has not yet appeared, but anticipates timely filing its motion to dismiss on November 17, 2023. Daniel Defense has reviewed and agrees with this Joint Motion for a Stay, and anticipates adopting the arguments herein shortly after it appears.

Dated: November 15, 2023

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of November 2023, I filed the foregoing Motion via the Court's Electronic Case Filing (ECF) system, which will send a Notice of Electronic Filing (NEF) to the parties of record.

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